

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 21-__
v.		DATE FILED:
	:	VIOLATION:
JONNEL PERKINS	:	18 U.S.C. § 656 (bank embezzlement by a bank employee – 1 count)
	:	Notice of Forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Citizens Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.
2. Defendant Jonnel Perkins was an assistant manager at Citizens Bank, at 6324 Stenton Avenue, in Philadelphia, Pennsylvania.
3. From on or about June 25, 2019 through on or about September 26, 2019, in the Eastern District of Pennsylvania, defendant

JONNEL PERKINS,

being an employee, that is, a Retail Relationship Banker of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled, abstracted, purloined, and

willfully misapplied approximately \$207,450.00 in moneys and funds of, and money and funds intrusted to the custody and case of Citizens Bank.

In violation of Title 18, United States Code, Section 656.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 656, set forth in this information, defendant

JONNEL PERKINS

shall forfeit to the United States of America any property constituting, or derived from, proceeds she obtained directly or indirectly, as a result of such violation; including but not limited to the sum of \$207,450.00.

2. If any of the property subject to forfeiture, as a result of any act or commission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A handwritten signature in blue ink, appearing to read "Jennifer Arbittier Williams for".

JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JONNEL PERKINS

INFORMATION

Count

18 U.S.C. § 656 (bank embezzlement by a bank employee – 1 count)

Notice of Forfeiture

A true bill.

Foreman

Filed in open court this _____ day,

Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
